

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SUZANNE JONES,

Plaintiff,

v.

H. NEIL MATKIN, in his personal and
official capacity; TONI JENKINS, in her
personal and official capacity; and COLLIN
COLLEGE,

Defendants.

Civil Action No. 4:21-cv-00733-ALM

PLAINTIFF'S MOTION TO STAY PROCEEDINGS PENDING SETTLEMENT

Plaintiff moves this Court to stay all proceedings pending settlement in this matter, including the November 1 discovery deadline [August 3, 2022 Order Granting Parties' Joint Motion to Modify Scheduling Order]. Good cause exists to grant the motion for the following reasons:

1. The parties have agreed on principal terms to settle Plaintiff's claims.
2. The parties require additional time to draft and finalize the details of the settlement.
3. The parties are working diligently toward finalizing the settlement, and Plaintiff believes that they will be able to file a stipulated dismissal of this matter by November 25, 2022, absent unforeseen circumstances.
4. Pending the Court's approval Plaintiff will file a status report 30 days after the date of this motion, should the parties have not yet dismissed the case.

5. This motion is not filed for purposes of delay, but that so justice may be done. For these reasons, Plaintiff requests the Court stay all proceedings pending the parties' efforts to finalize settlement of all claims in this matter. A proposed order is attached.

Respectfully submitted,

/s/ Greg Harold Greubel

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Counsel for Plaintiff Suzanne Jones

CERTIFICATE OF CONFERENCE

Plaintiff's counsel confirms that they attempted to confer with Defendants' counsel about this Motion on via email October 24, October 26, and October 28, and via phone call on October 27 and October 28, but did not receive a response concerning their consent to the Motion.

/s/ Greg Harold Greubel

Greg Harold Greubel

CERTIFICATE OF SERVICE

Plaintiff's counsel confirms that a true and correct copy of the foregoing was served via the Court's electronic filing system on this day, October 28, 2022. Notice of this filing will be sent by operation of the Court's electronic filing system to all counsel of record.

/s/ Greg Harold Greubel
Greg Harold Greubel